

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

In the Matter of )  
 )  
Distribution of )  
Cable Royalty Funds )  
 )  
In the Matter of )  
 )  
Distribution of )  
Satellite Royalty Funds )

CONSOLIDATED DOCKET NO.  
14-CRB-0010-CD/SD  
(2010-2013)

**MULTIGROUP CLAIMANTS' REPLY IN SUPPORT OF MOTION TO STRIKE  
SETTLING DEVOTIONAL CLAIMANTS' "MOTION TO SUPPLEMENT"**

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In its opposition brief, the SDC yet again acknowledge that the “new evidence” upon which its “motion to supplement” relies is not “new” at all, but rather evidence *already* submitted to the Judges by Multigroup Claimants. That is, the SDC seem intent on denying the very meaning of the word “new” in Webster’s Dictionary. On the false premise that “new evidence” has been submitted, the SDC acknowledge that the sole purpose for its motion was to submit “new argument”.

But the SDC’s argument is not “new” either, even though the SDC persist in asserting that its *Motion to Supplement* argument is not “repetitive of any arguments previously made”. SDC Opp. at 1-2. In fact, the SDC assert that its motion “makes no mention” of “fraud” or “fraudulent conveyances”, but ignores the very text of its *Motion to Supplement*. Despite the SDC previously complaining that the bankruptcy petition originally filed by former WSG-owner, non-party Alfred Galaz failed to mention “Multigroup Claimants”, the SDC’s *Motion to Supplement now* complains that his amended petition has expressly addressed Multigroup Claimants, and persist in challenging as false Alfred Galaz’s valuation of Multigroup Claimants and WSG as of January 1, 2018, and persists in citing to unrelated real estate transactions. See SDC *Motion to Supplement* at p.2. This argument is not based on “new evidence”, nor is it even “new argument”. Rather, it is redundant of the same unsubstantiated allegations submitted by the SDC before.

The SDC further perpetuate its absurd contention that it can *repeatedly* request Multigroup Claimants to de-designate restricted materials, even after pleading on such matter has concluded, and that Multigroup Claimants’ refusal to repeatedly engage with the SDC and affirmatively deny such request within three days results in a “waiver” Multigroup Claimants’ rights under the Protective Order. Such three-day period is *only* for the purpose of allowing a

requesting party to file a motion to de-designate (see Section V.D. of Protective Order), equates to a “meet and confer” requirement, and the Protective Order neither states nor connotes that failure to respond results in a “waiver” of rights. But again, the SDC continue to present a known falsehood to the Judges that a failure to respond within three days results in a “waiver of the protection of the Protective Order”. See SDC Opp. at p. 1 (first sentence). The very language of the Protective Order reveals that this is not the case, nor suggests that the parties go through yet-another pleading cycle on the *identical* subject matter simply because a party wants to make additional argument (or in the case of the SDC, redundant argument).

For the reasons set forth above, the SDC’s motion should be stricken and disregarded.

Respectfully submitted,

May 4, 2020

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## CERTIFICATE OF SERVICE

I hereby certify that on this 4th of May, 2020, a copy of the foregoing was filed with the eCRB system, and therefore sent by electronic mail to the parties listed on the attached Service List.

\_\_\_\_\_/s/\_\_\_\_\_  
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# Proof of Delivery

I hereby certify that on Wednesday, May 06, 2020, I provided a true and correct copy of the Multigroup Claimants' Reply In Support Of Motion To Strike Settling Devotional Claimants' "Motion To Supplement" to the following:

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Signed: /s/ Brian D Boydston